REMARKS

Reconsideration and allowance of the subject application are respectfully solicited.

Claims 19, 24, 25, and 30 are pending, with Claims 19 and 25 being independent. Claims 31 has been cancelled without prejudice. Claims 19, 24, 25, and 30 have been amended.

Claims 19, 21, 24, 25, 27, 30, and 31 again were rejected under 35 U.S.C. § 102(e) over US 6,847,405 B2 (Hsu, et al.). All rejections are respectfully traversed.

Claims 19 and 25 variously recite, *inter alia*, determining whether motion information on an interpolation pixel on a line between two interlaced lines is a moving image or a still image based on the motion information on reference pixels, with determining the motion information on the reference pixel in an n-th field as a moving image when a difference of the pixel value information between the reference pixel in the n-th field and the reference pixel at the same position the (n-2)-th field is larger than a predetermined value, and, otherwise, determines the motion information on the reference pixel in the n-th field as a still image, in combination with determining the motion information on the interpolation pixel the n-th field as a moving image when the motion information on the reference pixel adjacent to the interpolation pixel on a line above or below the interpolation pixel in the n-th field indicates a moving image, or when both of the motion information on the reference pixel in the (n-1)-th field and the motion information on the reference pixel in the (n+1)-th field indicate a moving image, and, otherwise, determining the motion information on the interpolation pixel in the n-th field as a still image.

However, Applicants respectfully submit that Hsu, et al. fails to disclose or suggest at least the above-discussed claimed features as recited, *inter alia*, in Claims 19 and 25.

Applicants respectfully submit that Hsu, et al. discloses, e.g., using pixel information of a current field, previous field, and future field (Abstract), and using pixel information (***not*** *motion information*) associated with nearby pixels A, B, C, and D found in fields (n–1), (n), and (n+1) (e.g., col. 6, lines 3 et seq.), and determining the pixel level motion strength interpolation M_p of field (n) (e.g., col. 6, line 28), i.e., *calculating motion information on*

an interpolation pixel from pixel value information. See also col. 5, line 57 through col 6, line 49.

Applicants respectfully submit that neither the foregoing nor the remainder of Hsu, et al. provides either a description or a suggestion of at least the above-discussed claimed features as recited, *inter alia*, in Claims 19 and 25. Applicants wish to emphasize that Hsu, et al.'s Fig. 2 pertains to using *pixel value information* on the reference pixels for motion determination of the interpolation pixel — not *motion information* on the reference pixels as claimed. Applicants submit that, in other words, Hsu, et al. determines, e.g., motion of the interpolation pixel in the vertical direction from the pixel values of two reference pixels in the above and below lines, and determines motion in the horizontal direction from the pixel values of two reference pixels in the previous and next fields; for example, in the case that the pixel value of the reference pixel in the above line is the same as that of the reference pixel in the below line, Hsu, et al. determines that the interpolation pixel does not move in the vertical direction. Applicants respectfully submit that in contrast, by using the present invention, motion information on the interpolation pixel may be determined as a moving image when motion information on any reference pixel indicates a moving image, even if the pixel values of two reference pixels in the above and below lines are the same.

Applicants further respectfully submit that there has been no showing of any indication of motivation in the cited documents that would lead one having ordinary skill in the art to arrive at the above-discussed claimed features.

The dependent claims are also submitted to be patentable because they set forth additional aspects of the present invention and are dependent from independent claims discussed above. Therefore, separate and individual consideration of each dependent claim is respectfully requested.

REQUEST FOR ENTRY OF AMENDMENT

This Amendment After Final Rejection is an earnest attempt to advance prosecution and reduce the number of issues, and is believed to clearly place this application in condition for

allowance. Furthermore, Applicants respectfully submit that a full appreciation of these amendments will not require undue time or effort given the Examiner's familiarity with this application. Moreover, this Amendment was not earlier presented because Applicants earnestly believed that the prior Amendment placed the subject application in condition for allowance. Accordingly, entry of this Amendment under 37 C.F.R. § 1.116 is respectfully requested.

CONCLUSION

Applicants submit that this application is in condition for allowance, and a Notice of Allowance is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address given below.

Respectfully submitted,

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